Ty Clarke <tclarke@lawyersftp.com>

Jun 2, 2025, 2:48 PM

to Nicole, Eduardo, Danielle, Nicole, Patrick, Luis, Molly ▾

Hi Nicole and Eduardo,

In light of our conversation last week, we need to move forward with scheduling the depositions of Defendants Joshua Roman and Ofc. Jorge Aguirre. We will be taking these depositions in-person. We can either take the depositions in our office in Oakland or, alternatively, in Fresno.

We have the following dates available for the depositions: 8/5, 8/6, 8/12, 8/13, 8/14, 8/15, 8/19, and 8/20.

I figured it would be easier for all of us if we did both depositions on one day. To that end, we can agree to do Defendant Roman's deposition at 10 AM and Aguirre at 2 PM on any of those proposed dates as long as you have no objections to Aguirre's depo going until 6 PM.

Can you please run these dates by the Defendants and let us know what dates work on your end? Please also let us know whether we should notice them for Oakland or Fresno.

Thanks,
Ty